

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES APWU/USPS-10 AND 11**
(September 22, 2011)

The United States Postal Service hereby objects to American Postal Workers Union interrogatories APWU/USPS-10 and 11, dated September 15, 2011. The interrogatories are repeated below and followed by a statement of the basis for the objections.

APWU/USPS-10 During the September 8, 2011 hearing on the Postal Service's direct case, Postal Service Witness James Boldt testified about the removal of Alaskan postal facilities from the RAOI list of candidates to be studied for discontinuance.

- a) Please identify each Alaskan facility that was removed from the RAOI list and the rationale for each decision to remove.
- b) Please provide any documentation related to the removal of these facilities from consideration.
- c) Were any of the Alaskan facilities that remain on the RAOI list also studied for possible removal? If so, why did these facilities remain on the list?
- d) Please provide any documentation supporting the decision to keep each remaining Alaskan facility on the RAOI list.

APWU/USPS-11

During the September 8, 2011 hearing on the Postal Service's direct case, Postal Service Witness James Boldt also testified that approximately 80 facilities had been removed from the RAOI list of candidates to be studied for discontinuance.

- a) Please identify each facility removed from the list and the rationale for each decision.
- b) Please provide any documentation related to the removal of these facilities from consideration.

PRC Order No. 778 established August 30, 1011, as the deadline for intervenor discovery on the Postal Service's direct testimony and September 9, 2011 as the deadline for intervenor discovery directed to the Postal Service for the purpose of developing their direct cases. Presiding Officer's Ruling No. N2011-1/14 adjusted the procedural schedule by shifting the deadline for the filing of intervenor testimony from September 19 to September 26, 2011. Neither the Order nor the Ruling authorizes the filing of new discovery on the Postal Service after September 9, 2011.

The preambles to the interrogatories in APWU/USPS-10 and 11 reference the September 8, 2011 oral testimony of Postal Service witness Boldt. APWU had the opportunity to cross-examine witness Boldt and follow-up on the Commission's cross-examination. Witness Boldt addressed the issue of the elimination of some Alaska RAO Initiative candidate facilities as a result of preliminary feasibility analysis in response to written cross-examination that was designated into evidence. Tr. Vol. 1 at 252-53. APWU elected not to follow-up on that interrogatory response in writing or during oral cross-examination. Having made that choice, APWU should not now be permitted unilaterally to extend written discovery beyond the period established by the Commission.

Yesterday, the Postal Service filed Library Reference N2011-1/11, the first monthly update identifying the RAO Initiative facilities that, on the basis of local investigation as of August 31, 2011, have been eliminated from further consideration. Coincidentally, that information is responsive, in part, to APWU/USPS-10(a) and 11(a). Were APWU to review the testimony of witness

Boldt (USPS-T-1 at 22-23) indicating that the initiation of analysis of all 3650 RAO Initiative candidate sites was expected to take place on a rolling basis for 10 weeks beginning in late July, APWU would understand that the process of initiating facility-specific reviews was at mid-stream on the date of witness Boldt's appearance and would not be expected to be completed until mid-October 2011.

Accordingly, the Postal Service objects to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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